

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK**

MARTÍN JONATHAN BATALLA VIDAL,  
ANTONIO ALARCÓN, ELIANA FERNANDEZ,  
CARLOS VARGAS, CAROLINA FUNG FENG,  
M.B.F., by her next friend LUCIA FELIZ,  
XIMENA ZAMORA, SONIA MOLINA  
and JOHANA LARIOS SAINZ,

Case No. 1:16-cv-04756 (NGG)(VMS)

April 25, 2022

On behalf of themselves and all other  
similarly situated individuals,

and MAKE THE ROAD NEW YORK,

On behalf of itself, its members, and its  
clients,

*Plaintiffs,*

v.

ALEJANDRO MAYORKAS, in his official  
capacity as Secretary of Homeland Security,  
et al.,

*Defendants.*

**DECLARATION OF MUNEER AHMAD**

Pursuant to 28 U.S.C § 1746, I hereby declare as follows:

1. My name is Muneer Ahmad. I am the Deputy Dean for Experiential Education and Sol Goldman Clinical Professor of Law at Yale Law School. I co-teach the Worker & Immigrant Rights Advocacy Clinic (WIRAC), a part of the Jerome N. Frank Legal Services Organization (LSO).
2. Attached hereto as Exhibit A is a true and correct copy of a receipt confirming the submission of Ms. Johana Larios Sainz's first-time DACA application, and a notice scheduling biometrics in support of this application, entitled "DACA Application Documents, Johana Larios Sainz."

3. Attached hereto as Exhibit B is a true and correct copy of a receipt confirming the submission of M.B.F.'s first-time DACA application, a notice from USCIS of intent to re-use previously-captured biometrics in support of this application, and notice of grant of DACA, entitled "DACA Documents, M.B.F."
4. Attached hereto as Exhibit C is a true and correct excerpted copy of the transcript from the April 4, 2022 pre-motion conference before this Court, entitled "Transcript of Pre-Motion Conference (Excerpt)."

Executed on this 25<sup>th</sup> day of April 2022, New Haven, Connecticut.

/s/ Muneer I. Ahmad